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6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE WESTERN DISTRICT OF WASHINGTON**

8 SCANNING TECHNOLOGIES
9 INNOVATIONS LLC,

10 Plaintiff,

11 v.

12 SMARTOSC US LLC,

13 Defendant.
14

Civil Action No. Case No. 2:19-cv-1002-RAJ

MOTION FOR DEFAULT JUDGMENT

NOTE ON MOTION CALENDAR: APRIL 22, 2020

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16 Plaintiff, Scanning Technologies Innovations LLC (“STI”) hereby submits this Motion For
17 Default Judgment.

18 1. On June 27, 2019, Plaintiff filed its Original Complaint against Smartosc US LLC
19 (Dkt. 1) alleging infringement of U.S. Patent No. 9,466,078. Defendant Smartosc US LLC was served
20 on July 3, 2019. Defendant was required to file an answer to the complaint on July 24, 2019.

21 2. To date Defendant Smartosc US LLC has not filed an answer or otherwise responded
22 to the complaint.

23 3. On September 9, 2019 Plaintiff Scanning Technologies LLC filed its Motion For
24 Entry of Default Judgment (Dkt. 9). The court entered the Clerk’s Entry of Default on September 10,
25 2019 (Dkt. 11). To date, Defendant has not filed an answer to the Original Complaint.

26 4. Plaintiff respectfully submits that damages should be based upon a reasonable royalty
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1 and that the reasonable royalty should be calculated as set forth in the Affidavit of Leigh Rothschild
2 (Exhibit A); see paragraphs 4-8. The amount of a reasonable royalty according to this calculation is
3 \$1,071,000.

4 5. At a minimum, damages should be no lower than \$50,000. See Exhibit A, paragraphs
5 9-11.

6 6. Plaintiff respectfully asks this court to enter a default judgment in favor of Plaintiff
7 ordering Defendant to pay Plaintiff an amount of damages of \$1,071,000, but no less than \$50,000.

8 Plaintiff Scanning Technologies Innovations LLC therefore moves the Court for an order of
9 Default Judgment.
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11 Dated: April 22, 2020

Respectfully Submitted,

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13 By: /s/ Nicholas Ranallo

Nicholas Ranallo

14 **NICHOLAS RANALLO, ATTORNEY AT
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18 **ATTORNEYS FOR PLAINTIFF**
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